

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
EUDIS MANUEL SOSA : CHAPTER 13
Debtor. :

PENNYMAC LOAN SERVICES, LLC :
Movant, :
 :
vs. :
EUDIS MANUEL SOSA : CHAPTER 13
 : CASE NO. 5-24-01476
Respondents. :

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362**

AND NOW COMES, Eudis Manuel Sosa, the Debtors, and files an Answer to Pennymac
Loan Services Motion for Relief From the Automatic Stay:

1. Eudis Manuel Sosa (hereinafter the "Debtors") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make monthly payments.
3. Counsel for Debtor is attempting to contact the Debtor to ascertain if the payments have been made and/or if the Debtor is in possession of the funds needed to cure the alleged default.
4. In the event there remains an arrears, the Debtor wishes to enter into a Stipulation to include the arrears in an amended Plan and/or over a six (6) month period.
5. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: January 19, 2025

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
381 N. 9th Avenue
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(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 19, 2025, he caused a true and correct copy
of Debtor's Answer to Kubota Credit Corporation's Motion for Relief from the Automatic Stay to
be served Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the
following:

Jack N. Zaharopoulos, Esq. at info@pamd13trustee.com

Brent J. Lemon, Esq. at blemon@kmlawgroup.com

Dated: January 19, 2025

/s/Tullio DeLuca
Tullio DeLuca, Esquire